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Attorneys for Defendants, Jennifer Velez, in her official capacity as Commissioner, State of New Jersey Department of Human Services and the State of New Jersey

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY
NEWARK, NEW JERSEY

Plaintiff,

DISABILITY RIGHTS NEW JERSEY, INC.,
a New Jersey non-profit corporation

vs.

Defendants,

JENNIFER VELEZ, in her official capacity
as Commissioner, State of New Jersey
Department of Human Services, and
POONAM ALAIGH, in her official capacity
as Commissioner, State of New Jersey
Department of Health and Senior Services
and State of New Jersey

Honorable Dickinson R. Debevoise, Sr.,
U.S.S.D.J

CIVIL ACTION NO. 2:10-cv-3950(DRD/PS)

CERTIFICATION OF EXHIBITS

ELECTRONICALLY FILED

I, Susan K. O'Connor, do hereby certify as follows:

1. I am an attorney-at-law of the State of New Jersey, a partner in the law firm of Hoagland, Longo, Moran, Dunst & Doukas, LLP, attorneys for the Defendants, Jennifer Velez, in her official capacity as Commissioner, State of New Jersey Department of Human Services and the State of New Jersey, and am fully familiar with, and responsible for the handling of, the within matter.

2. Attached as Exhibit A is a true and accurate copy of Administrative Bulletin Transmittal Memorandum dated June 1, 2012, A.B. 5:04B effective June 4, 2012, and June 7, 2012 Transmittal Correspondence.

3. Attached as Exhibit B is a true and accurate copy of Plaintiff's Responses to Defendants' Demand for Admissions, dated August 14, 2012.

4. Attached as Exhibit C is a true and accurate copy of the Expert report of Dr. Paul S. Appelbaum.

5. Attached as Exhibit D is a true and accurate copy of Curriculum Vitae of Dr. Paul Appelbaum.

6. Attached as Exhibit E is a true and accurate copy of Excerpts of DMHAS OMB No. 0930-0168 approved July 19, 2011.

7. Attached as Exhibit F is a true and accurate copy of Excerpts of the State and DHS Budgets.

8. Attached as Exhibit G is a true and accurate copy of DMHAS Office Descriptions.

9. Attached as Exhibit H is a true and accurate copy of DMHAS Organizational Chart.

10. Attached as Exhibit I is a true and accurate copy of DHS Website, Office of State Hospital Management.

11. Attached as Exhibit J is a true and accurate copy of the relevant portions of the Deposition transcript of Dr. Robert Eilers, dated March 26, 2012.

12. Attached as Exhibit K is a true and accurate copy of the relevant portions of the Deposition transcript of DRNJ Advocate Louan Lukens, dated March 3, 2012.

13. Attached as Exhibit L is a true and accurate copy of the Plaintiff's Responses to Defendant's Demand for Admissions, dated June 15, 2012.

14. Attached as Exhibit M is a true and accurate copy of excerpts from Governor's Task Force on Mental Health Final Report, dated March 31, 2005.

15. Attached as Exhibit N is a true and accurate copy of Excerpts from Exhibit A to Defendant's Answers to Interrogatories.

16. Attached as Exhibit O is a true and accurate copy of relevant portions of the Deposition transcript of Micaela Bennett, dated April 4, 2012.

17. Attached as Exhibit P is a true and accurate copy of Deposition Exhibit No. 51 introduced at the Deposition of Micaela Bennett.

18. Attached as Exhibit Q is a true and accurate copy of Letter dated April 20, 2012 amending list of annual number of Civil Commitment Hearings.

19. Attached as Exhibit R is a true and accurate copy of Census Data Chart.

20. Attached as Exhibit S is a true and accurate copy of Orientation Documents.

21. Attached as Exhibit T is a true and accurate copy of relevant portions of the Deposition transcript of Karen Piren, dated January 30, 2012.

22. Attached as Exhibit U is a true and accurate copy of relevant portions of the Deposition transcript of Anthony Haynes, dated January 24, 2012.

23. Attached as Exhibit V is a true and accurate copy of relevant portions of the Deposition transcript of John Luchkiw, dated March 15, 2012.

24. Attached as Exhibit W is a true and accurate copy of relevant portions of the Deposition transcript of Kim Evans-Mallory, dated March 20, 2012.

25. Attached as Exhibit X is a true and accurate copy of Examples of posted notices on bulletin boards at Ancora.

26. Attached as Exhibit Y is a true and accurate copy of relevant portions of the Deposition transcript of Rachel Parsio, dated February 21, 2012.

27. Attached as Exhibit Z is a true and accurate copy of relevant portions of the Deposition transcript of Marilyn Spensley, dated February 2, 2012.

28. Attached as Exhibit AA is a true and accurate copy of relevant portions of the Deposition transcript of Joseph Young, dated March 8, 2012.

29. Attached as Exhibit BB is a true and accurate copy of Division of Mental Health Services Website, Treatment Teams Descriptions.

30. Attached as Exhibit CC is a true and accurate copy of relevant portions of the Deposition transcript of Judge Robert Killian, dated May 18, 2012.

31. Attached as Exhibit DD is a true and accurate copy of relevant portions of the Deposition transcript of Patrick Fox, dated June 1, 2012.

32. Attached as Exhibit EE is a true and accurate copy of relevant portions of the Deposition transcript of Lisa Ciaston, dated April 10, 2012.

33. Attached as Exhibit FF is a true and accurate copy of Defendants' Letter Amending Discovery Responses dated August 6, 2012.

34. Attached as Exhibit GG is a true and accurate copy of Defendant's Answers to Interrogatories, No. 5.

35. Attached as Exhibit HH is a true and accurate copy of Defendant's response to production of documents, No. 15.

36. Attached as Exhibit II is a true and accurate copy of Training Materials

37. Attached as Exhibit JJ is a true and accurate copy of Exhibit D-64 of Killian's deposition.

38. Attached as Exhibit KK is a true and accurate copy of Judge Killian article JV251778-JV251780.

39. Attached as Exhibit LL is a true and accurate copy of Documents produced by Plaintiff concerning patients.

40. Attached as Exhibit MM is a true and accurate copy of CEO Letter re S.L. July 17, 2008.

41. Attached as Exhibit NN is a true and accurate copy of relevant portions of the Deposition transcript of Dr. Matthew Dumont, dated October 15, 2012.

42. Attached as Exhibit OO is a true and accurate copy of Exhibit D-2 introduced at the Deposition of Dr. Matthew Dumont.

43. Attached as Exhibit PP is a true and accurate copy of relevant portions of the Deposition transcript of Dr. Paul Appelbaum, dated November 14, 2012.

44. Attached as Exhibit QQ is a true and accurate copy of September 2012 Hearing Documents regarding specific patients.

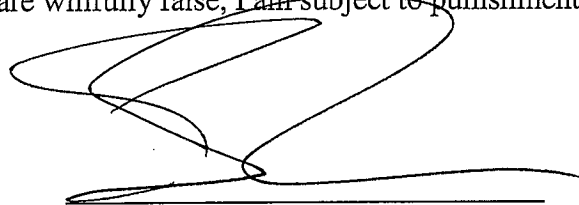
45. Attached as Exhibit RR is a true and accurate copy of Minutes of PAIMI Advisory Council, March 5, 2008

46. Attached as Exhibit SS is a true and accurate copy of Harper Amicus Brief selected pages.

47. The within Certification is made in support of this Defendants' Motion for Summary Judgment.

48. The Final Pre-Trial Conference is scheduled with the Hon. Patty Shwartz for January 16, 2013.

49. I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

A handwritten signature in black ink, appearing to read 'Susan K. O'Connor', written over a horizontal line.

Susan K. O'Connor

Dated: November 28, 2012